

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA

TANJA BENTON,

Plaintiff,

v.

BLUECROSS BLUESHIELD OF  
TENNESSEE, INC.,

Defendant.

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No. 1:22-cv-00118-CEA-SKL

**MOTION TO COMPEL DISCOVERY**

Comes Plaintiff, pursuant to Rule 37(a)(3)(A)-(B) of the Federal Rules of Civil Procedure, and requests an Order compelling Defendant to make proper initial disclosures under Rule 26(a)(1), to provide a sworn verification for interrogatories, and to produce relevant documents. Pursuant to Rule 37(a)(5), Plaintiff seeks attorney fees incurred in the filing of this motion.

The undersigned counsel for Plaintiff certifies that he has in good faith conferred with counsel for Defendant on multiple occasions in an attempt to secure the requested discovery information prior to seeking this Court's intervention. Plaintiff invites the Court to review her supporting memorandum of law, which is being filed contemporaneously herewith.

Respectfully submitted,

**MIKEL & HAMILL PLLC**

By: s/ Doug S. Hamill

Doug S. Hamill, BPR No. 022825

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of November, 2022, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

By: s/ Doug S. Hamill